

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

State of Minnesota, by its
Attorney General Lori Swanson,

Civil File No. 12-145 RHK/JJK

Plaintiff,

v.

AFFIDAVIT OF CAROL ANNE WALL

Accretive Health, Inc.,

Defendant.

Carol Anne Wall, being first duly sworn on oath, state as follows:

1. My name is Carol Anne Wall. I am 53 years old. I live in St. Paul, Minnesota with my husband John and our two girls, Sarah and Rachel. Sarah is 13 and attends Highland Middle School. Rachel is 10 and attends Randolph Heights. John and I adopted Sarah and Rachel from orphanages in China. I grew up in Inver Grove Heights. I received my Bachelor's degree from the College of St. Benedict and my Masters Degree in technical writing from Metro State. I am currently a project manager for Securian Financial Group in St. Paul.

2. On January 31, 2012 I began to experience profuse vaginal hemorrhaging of blood. I called John from work, and he took me to the Emergency Room at Fairview Riverside Hospital in Minneapolis. At the Emergency Room, I was put into a gown and on an examination table. The medical providers conducted a preliminary examination and then left the room. I was still not diagnosed. After the quick preliminary exam, they left the room and a finance woman entered the room while I was waiting for the doctors

to diagnose me and determine my treatment. She had a cart and a computer and told me I needed to pay in excess of \$300. The woman was insistent on payment. I was shocked but gave her my credit card because I was in a vulnerable position and wanted to get rid of her. At the time she asked me for payment, I was still bleeding heavily from my vaginal area. I was worried I might need emergency surgery. While in the ER, my condition worsened, and I experienced cramping, pain, and began feeling woozy from all the blood loss. After the finance woman left, the providers performed a more thorough examination and prescribed my treatment. I was very troubled at the time to be asked for a credit card while in the Emergency Room bed, and the incident increased my anxiety level at an already worrisome time.

3. Two weeks later, on February 12, 2012, a Sunday, I laid down for a nap about 4 p.m. Rachel and Sarah had just returned home from a gymnastics meet. When I woke up from the nap, I couldn't breathe well, had trouble talking, and was paralyzed on my left side. John called the paramedics, and they took me to the Emergency Room at Fairview Riverside Hospital. The paramedics started an IV. Once in the ER, the doctors and nurses hooked me up to blood pressure devices and began to perform neurological tests. While in the patient room in the midst of tests, a woman came in with the same type of cart as used two weeks earlier to request money. This made me mad and again increased my stress level as a patient in the ER. I was experiencing symptoms of a stroke and was in no position to deal with payment issues, so my husband talked to her, and she left. After she left, I had a CT scan of my head. The wave of symptoms that had first appeared at home increased in intensity, and the Riverside Emergency Room doctors

transferred me by ambulance to the Emergency Room at the University of Minnesota. At the University of Minnesota Medical Center, I was diagnosed with a stroke caused by a blood clot in my brain. I was hospitalized for two days to treat my stroke and was off work for two and one half weeks.

4. I have had two frightening medical episodes this year requiring Emergency Room care. It is stressful and worrisome for a patient to be in the Emergency Room even in the best of cases. Both times, I was worried about my health, feeling terrible physically, and worried about my kids and family. I adopted my two daughters from orphanages, and at the time I was asked for payment I was worried about them and whether they would be motherless. To be asked for payment in the Emergency Room was humiliating, lacked dignity, and heightened my levels of anxiety at an extraordinarily tense and worrisome time in my life.

Carol Anne Wall
CAROL ANNE WALL

Subscribed and sworn to before me
this 7th day of May,
2012.

Deborah A. Lindberg
Notary Public

